H.C. Fulcher
P.O. Box 134
ASH FORK, AZ.
86320

PHOENIX AZ 852
22 AUG 2024 PM 9 L

FREEDOM
FOREVER USA

SECRETARY FEDERAL COMMUNICATIONS COMMISION
45 'L' STREET, NE
WASHINGTON, D.C.
20554

RECEIVED & INSPECTED
SEP 03 2024
FCC MAIL ROOM

20554-

Subject: Opposition to NextNav's Proposed License Modification - FCC Docket 24-240

To Whom It May Concern,

My name is A.C. Fulcher, and I am a licensed Amateur Radio operator with the callsign N4SVD. I am writing to express my strong opposition to NextNav's request to modify their existing license, seeking to operate in the 902-907 MHz and 918-928 MHz bands. My concerns are based on previous experience with NextNav's operations and the significant interference they caused within the 900 MHz spectrum.

Several years ago, NextNav conducted testing in the Santa Clara area of the San Francisco Bay Area, which resulted in severe disruption to all 900 MHz repeaters in the vicinity. At that time, they employed a HAM operator to handle frequency coordination, who unfortunately followed the ARRL band plan for the 33cm band. Given the extensive Part-15 interference within this spectrum, the current ARRL band plan is not widely followed today. Following consultations and a report to the ARRL, NextNav agreed to relocate their operations to the 922-926 MHz range, which alleviated the interference. However, the fact that they are now seeking to modify their license again raises significant concerns about the potential for renewed and widespread disruption.

The equipment used by NextNav is of high power and wide bandwidth, with the potential to severely disrupt any repeater—whether transmitting or receiving—over a large area. This equipment functions similarly to a localized GPS system, designed to provide precise location data, including floor-level information for 911 callers. However, the continuous transmission of timed 100ms bursts essentially occupies the entire second, leading to constant data transmission that can overwhelm the 900 MHz band.

NextNav's past activities have already demonstrated their potential to cause harmful interference. In Dallas, their operations similarly disrupted 900 MHz repeaters until they were forced to move their operations below 927 MHz. While the need for accurate location services is understandable, these services should not come at the expense of the HAM community or the integrity of the 900 MHz band.

Moreover, it is concerning that while HAM operators are licensed on this band and protected from interference, NextNav's operations must also avoid interfering with Part-15 devices. The unclear status of how NextNav's proposed license modification would address these conflicting obligations adds to the uncertainty and potential for harmful interference.

Given these factors, I strongly urge the FCC to deny NextNav's request to modify their license. It is critical that any modifications ensure the continued coexistence of services within this spectrum without causing undue harm or interference to existing operations.

Thank you for considering my comments on this important matter.

Sincerely,

A.C. Fulcher - N4SVD

RECEIVED & INSPECTED
SEP 03 2024
FCC MAIL ROOM